

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

| | | |
|--------------------------|---|----------------------------|
| SALLY C. PURSER, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| JOSEF F. BOEHM, ALLEN K. |) | |
| BOLLING and BAMBI TYREE |) | |
| |) | |
| Defendant. |) | Case No. 3:05-CV-00085-JKS |
| _____ |) | |

PLAINTIFF'S FIRST SET OF DISCOVERY REQUESTS

Pursuant to FEDERAL R. CIV. P. 26 and 33, the Plaintiff requests that the Defendant Boehm answer the attached interrogatories in writing and under oath within thirty (30) days from the date of service. Pursuant to FEDERAL R. CIV. P. 26 you are requested to supplement your answers if you become aware that those answers are incorrect, misleading or incomplete.

DEFINITIONS

Unless the question conclusively indicates otherwise, the following definitions apply to the words used in these interrogatories:

A. Person: The term "person" includes a corporation, partnership, other business association or entity, a natural person, and any government or government body, commission, board, or agency.

B. Document: The term "document" is defined to mean and include any and all graphic or physical representations, including without limitation all

handwritten, typed or printed material, photographs, copies of all the foregoing, and material stored on tape or any other magnetic medium.

C. Identification of Documents: When you are requested to “identify” a document, you are requested to provide the following with regard to each document:

(1) A description of the document with sufficient particularity to enable the custodian of the document to respond to a request for production or subpoena duces tecum for the document;

(2) The name, business address, residence address, telephone number, and occupation of the present custodian of the document;

(3) The date on which such document was first prepared; and,

(4) The name, business address, residence address, telephone number, and occupation of each person who prepared or signed the document.

D. Identification of Natural Person: When you are requested to “identify” a natural person, you are requested to provide the following with regard to each such person:

(1) The name of the person;

(2) The business address of the person;

(3) The residence address of the person;

(4) The business telephone number of the person;

(5) The residence telephone number of the person,

(6) The occupation of the person and the name of the employer of the person, if any.

E. Identification of Business Entity: When you are requested to “identify” any corporation, partnership, joint venture or other business entity, you are requested to provide the following with regard to each such entity:

- (1) Whether the entity is a corporation, partnership, joint venture, or other type of entity;
- (2) If the entity is a partnership or joint venture:
 - (I) identify each partner or joint venturer;
 - (ii) state whether he or she is a limited or general partner; and,
 - (iii) specify the date on which the partnership or joint venture was formed;
- (3) If the entity is a corporation:
 - (I) identify each of the current officers of the corporation;
 - (ii) state the date of incorporation;
 - (iii) state the State in which the corporation is incorporated

INTERROGATORIES

INTERROGATORY NO.1. Please provide copies of all the titles and documentation to all or any equipment and vehicles you own personally or on behalf of any and all businesses you are affiliated with for the last ten years.

ANSWER:

INTERROGATORY NO. 2: If you have received any inheritances, including any life insurance proceeds or lawsuit settlements or annuities in the last ten years. The type and value of the inheritance lawsuit settlements or insurance proceeds received in the last ten years; the approximate date such was received and what it was used for, if anything.

ANSWER:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce the last ten years of the Internal Revenue Tax return documents you filed with the IRS. Please include but not limited to the following, all tax returns for you personally, all partnerships you are affiliated with, all corporations you are affiliated with, all LLC you are affiliated all limited partnerships you are affiliated with and any other Federal tax returns you have filed.

REQUEST FOR PRODUCTION NO. 2:

Please produce the name, address and phone number, including but not limited to, for each and every tax person that assisted you with the preparation of your IRS tax returns for the last ten years.

REQUEST FOR PRODUCTION NO. 3:

Please produce including but not limited to, any State tax returns you filed in Alaska or any other State in the United States for the last ten years on behalf of yourself or any businesses that you are affiliated with in any way whatsoever. If the taxes were prepared by any third party or parties please produce them.

REQUEST FOR PRODUCTION NO. 4:

Please produce the name, address and phone number, including but not limited to, for each and every tax person that assisted you with the preparation of any State tax returns for the last ten years.

REQUEST FOR PRODUCTION NO. 5:

Please produce the name, address and phone number for, including but not limited to, any bank, savings and loan, holding facility, on or off shore accounts, stock accounts, that you have had in the last ten years.

REQUEST FOR PRODUCTION NO. 6:

Please produce including but not limited to your business ledgers, accounts receivables, payroll ledgers, books that you rely on to file State and Federal taxes, for each and every business you have been affiliated with for the last ten years.

REQUEST FOR PRODUCTION NO. 7:

Please produce including but not limited to the names, addresses and phone numbers of all or any business partner that you have conducted business with in the last ten years in the business known as Alaska Industrial Hardware, doing business as AIH or Alaska Industrial Hardware Inc.

REQUEST FOR PRODUCTION NO. 8:

Please produce including but not limited to the names, addresses and phone numbers of all or any business partner that you have conducted business with in the last ten years in any businesses outside the State of Alaska.

REQUEST FOR PRODUCTION NO. 9:

Please produce including but not limited to, copies of all corporation share stock certificates you hold in your name or in any other name in which you possess a interest in for the last ten years.

REQUEST FOR PRODUCTION NO. 10:

Please produce including but not limited to, the name, address and phone number for all such corporations, or limited partnerships, LLC as well as identifying their registered agent for the last ten years

REQUEST FOR PRODUCTION NO. 11:

Please produce including but limited to all or any notes you are holding whereas any party or any third parties that owe you money for loans, debts, business holdings or property you or any of your companies have sold to them in the last ten years.

REQUEST FOR PRODUCTION NO. 12:

Please produce including but limited to the names, address and phone numbers for any financial institution or collections agency that collect money from any parties on your behalf for the last ten years.

REQUEST FOR PRODUCTION NO. 13:

Please produce including but not limited to all or any year end balance sheets depicting your assets and liabilities for the last ten years.

REQUEST FOR PRODUCTION NO. 14:

Please produce including but limited to, all documents you filed at all or any lending institution to acquire a loan or line of credit in the last ten years.

REQUEST FOR PRODUCTION NO. 15:

Please produce the names, addresses and phone numbers for all stock holders and investors in any and all Alaska Industrial Hardware stores located in Alaska for the last ten years.

REQUEST FOR PRODUCTION NO. 16:

Please list all assets you have sold, given away or transferred to any parties since you have been charged in the Federal case involving Sally Purser.

REQUEST FOR PRODUCTION NO. 17:

Please identify the parties that you have given, transferred or sold any assets to since you were charged in the Federal case involving Sally Purser. Please provide their name, address and phone number.

REQUEST FOR PRODUCTION NO.18 :

Please provide including but not limited to, the name, address and phone number for any institution where you have cash on deposit or cash held in a security box.

REQUEST FOR PRODUCTION NO. 19:

Please list all assets you have sold, given away or transferred to any parties for the last ten years.

ADMISSIONS:

1. Please admit that you own fifty percent (50%) or more of Alaska Industrial Hardware Store located within Alaska or it's Corporation.

ANSWER:

2. Please admit that you own some percentage of Alaska Industrial Hardware Store located within Alaska or it's Corporation and state what that percentage is for the last ten years, year by year.

ANSWER:

3. Please admit that since the time you were charged in the Federal Criminal proceedings involving Sally Purser and other minor children you have not hid, transferred, sold or given away any assets to protect them from being attached by Sally Purser.

ANSWER:

4. Please admit that you entered into a plea agreement with the United States Government with regard to the Federal case involving Sally Purser.

ANSWER:

5. Please admit that you own some percentage of ownership in businesses outside the State of Alaska and identify the interest.

ANSWER:

6. Please admit that you have filed all the required income taxes with the Internal Revenue Service in the last ten years, for yourself personally and all or any businesses you are required to do so.

ANSWER:

7. Please admit that you have filed all the required Corporation tax documents with the State of Alaska in the last ten years for any and all businesses you are affiliated with.

ANSWER:

8. Please admit that you filed all the required tax documents in any other State of the United States in which you are required to do so, for yourself personally on behalf of any and all businesses you are affiliated with, for the last ten years.

ANSWER:

DATED at Anchorage, Alaska, this _____, day of _____, 2006.

LAW OFFICE OF DARRYL L. JONES
Attorney for Plaintiff, Joseph Donahue, Jr

By: _____
Darryl L. Jones, Esq.
ABA # 8811188